EXHIBIT
B
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CONSORZIO DEL PROSCIUTTO DI SAN DANIELE, Plaintiff	)	
v.	)	C.A. No. 07-039ML
DANIELE, INC., Defendant.	)	

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO DEFENDANT

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendant produce for inspection and copying by Plaintiff within thirty (30) days of service of this Request, at 10:00 a.m. at the office of Plaintiff's counsel, all of the following documents and things within the possession, custody or control of Defendant.

DEFINITIONS AND INSTRUCTIONS

A. Documents and Things, as hereinafter requested, shall include but shall not be limited to all papers, letters, memoranda, notes, slips, business records, invoices, purchase orders, advertising, catalogs, catalog sheets, photographs, drawings, flyers, promotional material, receipts, cancelled checks, labels, cartons, containers, contracts, writings, video tape recordings, audio recordings, files, telegrams, written statements, transcripts, memoranda of any telephone or other oral communications, sketches, specifications, graphs, manuals, agreements, licenses, e-mail communications, Internet web pages, and all other documents and things discussing referring to, or constituting embodiments of the following matters and things.

B. "Plaintiff" shall mean the Consorzio del Prosciutto di San Daniele. "Defendant" or "DANIELE" shall mean Daniele International, Inc., and all subsidiaries, divisions, and predecessors in interest thereof.

C. These requests require production of all documents that are known or available to the Defendant, including all documents in the possession of any agent, employee, officer, director, attorney, accountant, auditor, public relations advisor, or other person acting or purporting to act on behalf of the Defendant.

D. If you assert as an objection to any of these requests that a document is privileged, please state:

a. The exact privilege that you believe is involved, identifying each such privilege with the specific number of the Request;

b. Whether each such privilege asserted is based on a statute, construction or interpretation of a statute, case law, or a secondary source;

c. If a privilege is based in any way on a statute, please give the citation to each statute, identifying each statute with the privilege asserted;

d. If the privilege is based on case law, please give the citations to all cases that support the privilege, identifying each case with the privilege asserted;

e. If a claimed privilege is based on the attorney-client privilege or work product doctrine, specify why you believe that the specific elements of the privilege have been satisfied, and identify the attorney(s) whom you allege were involved in the allegedly privileged communication.

f. State the date of such document;

g. Identify the type of document (i.e., letter, memorandum, etc.);

h. Set forth the subject matter of the document;

i. Identify each person who prepared it and each person (if any) who signed it;

j. Identify each person to whom it was directed, circulated, or shown; and

k. Identify each person now in possession of the document.

E. In the event that any document called for by this Request has been destroyed or discarded, that document is to be identified by stating:

a. The nature of the document;

b. Any addressor or addressee;

c. Any indicated or blind copies;

d. The document's date, subject matter, number of pages, and attachments or appendices;

e. All persons to whom the document was distributed, shown, or explained;

f. Its date of destruction or discard, manner of destruction or discard, and reason for its destruction or discard; and

g. The persons authorizing or carrying out such destruction or discard.

F. Each request is continuing in nature. If, upon responding to these requests, Defendant thereafter learns that its response to any request is in some material respect incomplete or incorrect, Defendant shall promptly supplement its response to that request in accordance with Federal Rules of Civil Procedure 26(e) and 34 and the definitions and instructions contained herein.

G. Please segregate the documents produced according to the numbered Request to which you are responding.

REQUEST NO. 1

Specimens of all documents and things on which Defendant has used or intends to use the designation or trademark DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, or RISERVA, including but not limited to labels, promotional and advertising materials, advertisements, brochures, flyers, handbooks, manuals, catalogs, books, articles, pamphlets, brochures, workbooks, wrappers, cartons, containers, business establishment signs, posters, telephone directory advertisements, business cards, press releases, Internet web sites, e-mail communications and other electronically-available materials; photographs; federal, state or local government filings, licenses, applications or registrations (other than that at the U.S. Patent and Trademark Office); mailings; trade show materials; personal contacts; telephone calls; Web sites; signs; letterhead; envelopes and business cards.

REQUEST NO. 2

Copies of documents showing all forms in which the following designations have been used by Defendant in commerce: DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

REQUEST NO. 3

Copies of all orders for Defendant's prosciutto products since January 1, 2005.

REQUEST NO. 4

Copies of all invoices and shipping documents issued or prepared by Defendant for the sale of Defendant's prosciutto products since January 1, 2005.

REQUEST NO. 5

Copies of all documents in which any of the following is referred to or described as a trademark or is discussed as a possible trademark: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

REQUEST NO. 6

Copies of all documents which Defendant claims support its position with respect to the meaning of paragraph 5 of the Settlement Agreement of March 2005.

REQUEST NO. 7

Copies of all communications between Defendant and any other person concerning San Daniele or San Daniele prosciutto since August 1, 2003 not previously provided to Plaintiff.

REQUEST NO. 8

Copies of all market research, such as surveys and other investigations, relating to San Daniele, the Consorzio del Prosciutto di San Daniele, or any mark of the Consorzio.

REQUEST NO. 9

Copies of all documents containing or reflecting specifications for, or qualities or characteristics of, prosciutto sold by Defendant under each of the following designations since August 1, 2003: DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

REQUEST NO. 10

Copies of all documents in which Defendant or any employee or representative thereof has ever stated or suggested that Defendant is affiliated with or connected with San Daniele, the Consorzio di San Daniele or any member of the Consorzio.

REQUEST NO. 11

Copies of all documents in which Defendant or any employee or representative thereof has claimed that Defendant meets the standards for prosciutto of the Consorzio del Prosciutto di San Daniele since August 1, 2003, not previously provided to Plaintiff.

REQUEST NO. 12

Copies of any documents reflecting any fictitious name registered by Defendant under the laws of any state and also identify the state and date of such registration, since August 1, 2003 and not previously provided to Plaintiff.

REQUEST NO. 13

Copies of all documents on which Defendant intends to rely in establishing its first use of GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA as trademarks on prosciutto in the United States.

REQUEST NO. 14

Copies of all correspondence concerning Defendant's brochure of 1998 and Defendant's brochure of 2004.

REQUEST NO. 15

Copies of all promotional or advertising materials since August 1, 2003 not previously provided to Plaintiff, and not provided in response to Request No. 1 above, used or prepared by Defendant in connection with the sale of its prosciutto products, including but not limited to labels, promotional and advertising materials, advertisements, brochures, flyers, handbooks, manuals, catalogs, books, articles, pamphlets, brochures, workbooks, wrappers, cartons, containers, business establishment signs, posters, telephone directory advertisements, business cards, press releases, Internet web sites, e-mail communications and other electronically-